

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
WILSON DIVISION**

IN RE:) **Chapter 11**
)
ST. LAWRENCE HOMES, INC.,) **Case No. 09-00775-8-ATS**
)
Debtor)

RESPONSE TO DEBTOR'S PLAN OF REORGANIZATION

NOW COMES the Official Committee of Unsecured Creditors (the "Committee"), by and through the undersigned counsel, responding to the Debtor's Plan of Reorganization filed July 2, 2009 (the "Plan"), and in support thereof, shows unto the Court the following:

1. Following extensive negotiations between the Debtor and the Committee regarding the proposed treatment of Class 19 Unsecured Claims, the Debtor has agreed to modify the Plan to include more favorable treatment of Class 19 Unsecured Claims. Debtor's counsel will file a proposed modification to the Plan which will incorporate the agreed treatment of Class 19 claims. Based upon the agreement between the Committee and the Debtor regarding the terms of the modified Plan, the Committee supports confirmation of the modified Plan assuming that the modified Plan as eventually filed is consistent with the terms previously agreed upon with Debtor's counsel. The Committee reserves the right to amend this response and object to the modified Plan to the extent any of the terms in the modified Plan are inconsistent with the terms agreed upon by the parties.

2. Counsel for the Committee has reviewed in detail the loan documents attached to the proofs of claim filed by the major secured creditors in the case. Questions have arisen with regard to the perfection of certain liens and/or lack of documentation regarding certain loans. The Committee has brought these issues to the attention of the Debtor and has requested

supplemental information from certain secured creditors and/or the Debtor with regard to specific loans involving Regions Bank, Charles Mitchell and Anthony Bryan Perry and SunTrust in order to ensure that these creditors hold properly perfected security interests in their collateral. While the Committee supports confirmation of the modified Plan as agreed with Debtor's counsel, the Committee reserves the right to object to the claims of these and other secured creditors, or to bring such other actions as may be necessary, if the issues regarding lien perfection are not resolved and otherwise pursued by the Debtor.

Respectfully submitted, this the 17th day of August 2009.

SMITH, ANDERSON, BLOUNT, DORSETT,
MITCHELL & JERNIGAN, L.L.P.

By: /s/ Anna B. Osterhout
Amos U. Priester, IV
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CERTIFICATE OF SERVICE

I hereby certify that on the date below, a copy of the foregoing Response to Debtor's Plan of Reorganization was served on the parties named below in the manner indicated.

By electronic service VIA CM/ECF

Marjorie K. Lynch, Esq.
Bankruptcy Administrator
P. O. Box 3758
Wilson, North Carolina 27895

Stephani W. Humrickhouse, Esq.
Attorney for Debtor
Nicholls & Crampton, P.A.
P. O. Box 18237
Raleigh, North Carolina 27619

VIA U.S. First Class Mail, postage pre-paid

Fast & Lite, Inc.
c/o Victor Thomas
3502 Hayes Road
Monroe, NC 28110

J.F. Chang Construction, LLC
c/o Suk J. Chang
8922 Whittingham Dr.
Waxhaw, NC 28173

Gale Force Sports & Entertainment, LLC
c/o William Traurig
1400 Edwards Mill Road
Raleigh, NC 27607

Ellington Paving
c/o Bruce Hamilton
5110 Union Drive
Wake Forest, NC 27587

St. Lawrence Homes, Inc., Debtor
7200 Falls of the Neuse Road
Raleigh, NC 27615

Dated: August 17, 2009

SMITH, ANDERSON, BLOUNT, DORSETT,
MITCHELL & JERNIGAN, L.L.P.

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